RICHARD I. DREITZER Nevada Bar No. 6626 2 Richard.Dreitzer@wilsonelser.com WILSON ELSEK MOSKOWITZ EDELMAN & DICKER LLP 300 South Fourth Street, 11th Floor 3 Las Vegas, NV 89101 Telephone 702.727.1400 4 Facsimile 702.727.1401 5 Attorneys for RELIANCE STANDARD LIFE INSURANCE COMPANY 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 EDGAR ORTIZ, Case No. 2:17-cv-00580-JAD-GWF 9 Plaintiff, 10 STIPULATION TO AMEND DEADLINE FOR PARTIES TO SUBMIT INITIAL 11 DISCOVERY PLAN AND SCHEDULING VS. ORDER 12 RELIANCE STANDARD LIFE [FIRST REQUEST] INSURANCE COMPANY, 13 14 Defendants. 15 16 Plaintiff, EDGAR ORTIZ, and Defendant RELIANCE STANDARD LIFE INSURANCE COMPANY (hereinafter "Reliance"), by and through their respective counsel of record, do hereby 17 stipulate to amend the deadline for parties to submit their initial Discovery Plan and Scheduling 18 Order pursuant to Rule 26(f)(2) of the Federal Rules of Civil Procedure ("FRCP") and Local Rules 19 26-1(a) and 26-4. 20 The Parties have agreed and submit this Stipulation to the Court to request an additional 21: 21 22 days in which to complete and submit their initial Discovery Plan and Scheduling Order. The deadline for the parties' initial Discovery Plan and Scheduling Order is June 12, 2017. The parties' 23

proposed deadline is June 30, 2017. This is the First Request for an extension of time.

June 9, 2017). This request is not imposed for improper reasons.

This request is based upon the workload of counsel (specifically, a) counsel for Defendant

will be presenting oral argument before the Ninth Circuit Court of Appeals the week of June 12,

2017, and b) counsel for Plaintiff did not receive notice of the current Discovery Plan due date until

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1	The parties certify that this stipulation is	s entered and made in good faith and is not fo
2	purposes of delay.	
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4	Dated thisday of June, 2017.	Dated this 12-74 day of June, 2017.
5	CLIFF W. MARCEK, P.C.	WILSON, ELSER, MOSKOWITZ, EDELMAN
6	[Mad (11 91 1	& DICKER LLP
7	alle warfee	
8	Cliff W. Marcek, Esq. Nevada Bar No. 5061	Richard I. Dreitzer Nevada Bar No. 6626
9	536 E. St. Louis Ave.	300 South Fourth Street, 11th Floor
10	Las Vegas, NV 89104 Attorney for EDGAR ORTIZ	Las Vegas, Nevada 89101 Attorney for RELIANCE STANDARD LIFE
11		INSURANCE COMPANY
12		
13	ORI	<u>DER</u>
14	IT IS SO ORDERED.	
15	DATED this 13th day of June	, 2017.
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17		Leonge Foley Is.
18		UNITED STATES MAGISTRATE JUDGE
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